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**SENT VIA ECF ONLY**

Magistrate Judge Steven I. Locke  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, NY 11722

Re: Northwell Health, Inc. v. United Welfare Fund, et al.  
No.: 21-CV-00020 (GB)(AKT)

Dear Magistrate Judge Locke,

My office represents the plaintiff, Northwell Health, Inc. (Northwell), in the above captioned lawsuit. I submit this Joint Status Report in accord with your order dated October 26, 2022 on behalf of the parties.

As previously reported, the parties retained an experienced, healthcare mediator, Ms. Conna Weiner, and participated in multiple and meaningful mediation sessions, independent sessions, and direct party talks. The parties have made meaningful progress and may have narrowed issues and claims. The parties have also exchanged material offers. However, the parties do not have a final agreement in place or in principle as of yet.

The parties have been, and remain committed to resolving this case whether directly or in the mediation process. However, considering that the parties have been in mediation for over three months, Northwell believes that the parties should consult with the court at the status conference on November 14, 2022 to discuss how to proceed in this case. Defendants believe that the parties could benefit from another two-week extension of the status conference to continue to try to reach resolution of this matter with the assistance of the mediator and propose the parties submit a further status report by November 21, 2022.

With respect to the status of discovery in this case, the parties proffered initial compliance with written discovery, but time is needed to obtain and ensure full compliance. Depositions have not yet occurred, and the parties have not yet discussed whether expert discovery is required or needed. Since retaining the mediator, the parties have exclusively focused on the mediation.

Thank you for your time and attention to this matter.

Respectfully submitted,

/s/

Thomas B. Noonan

cc via ECF: all counsel of record